

March 30, 2018

National Credit Union Administration
1775 Duke Street
Mary Thor, Office of Examination and Insurance
Alexandria, VA 22314

RE: Comments Regarding Call Report/Profile Content Modernization

Dear Ms. Mary Thor,

Dear Ms. Thor,

I am writing on behalf of the California and Nevada Credit Union Leagues (Leagues), one of the largest state trade associations for credit unions in the United States, representing the interests of more than 250 credit unions and their approximately 10.5 million members/consumers.

The Leagues welcome the opportunity to provide comments to the National Credit Union Administration (NCUA) on their Request for Information (RFI) regarding modernization of the Call Report and Profile form.

We commend the NCUA for your efforts to modernize and streamline the Call Report as well as your efforts under the Enterprise Solution Modernization (ESM) program to create an integrated examination and data environment.

The proposed changes to the accounts codes, in addition to streamlining for credit unions, are meant to help facilitate more offsite review by examiners and lessen their time in the credit union. The reorganized format is meant to support a future change where the Call Report will be adaptive—meaning credit unions would only need to complete questions relevant to their operations. It has been likened to the “Turbo Tax” method; that is, if you say no to a question, the system would then not present other related questions and simply skip to the section. These changes will be integrated with the ESM program. The Leagues fully support efforts that will streamline credit union processes and reduce examiner time spent on site in credit unions.

In the long haul these proposed changes will be beneficial to credit unions. However, with any change comes the burden of retooling processes, working with vendors, and learning new methods. The Leagues strongly encourage the NCUA provide a minimum implementation timeline of one year. This will allow credit unions to work with their core processors and other vendors to bring their systems into compliance.

In addition, while it may be possible for credit unions to map their general ledger data with their core data processor to autofill some of the Call Report, some smaller credit unions have not taken on this expense and work effort to do the mapping. The NCUA should be mindful of those credit unions that complete the Call Report manually before electronically uploading the report and ensure comprehensive and appropriate training is provided.

The Leagues urge the NCUA ensure directions and definitions in the Call Report instructions are as clear and complete as possible. We also recommend the Call Report instructions and definitions be available on the report as help screen pop-ups when a user selects help for a particular cell. This will significantly increase the usefulness and effectiveness of the instructions.

The Agency has requested very technical feedback on the proposed account code changes—those to be retired, added, or relocated. We trust the Agency will look closely at the specific and technical comments provided by credit unions.

Conclusion

The Leagues commend the NCUA Board for its efforts to streamline the Call Report and move to an integrated examination and data environment that will support more offsite review by examiners and lessen their time in the credit unions. We encourage the NCUA to provide not only clear, complete, and convenient instructions for completing the Call Report, but also to provide training. We urge the NCUA to establish a reasonable implementation date of at least one year.

We thank you for the opportunity to comment on the RFI and for considering our views.

Sincerely,

Diana Dykstra
President and CEO
California and Nevada Credit Union Leagues

cc: CCUL